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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

ILIO'ULAOKALANI COALITION,	)	CIVIL NO.04-00502 DAE BMK
a Hawai'i, nonprofit corporation;	)	
NA IMI PONO, a Hawai'i	)	FEDERAL DEFENDANTS' RESPONSE
unincorporated association; and	)	TO PLAINTIFFS' FIRST SET OF
KIPUKA, a Hawai'i unincorporated	)	INTERROGATORIES AND REQUEST
association,	)	FOR PRODUCTION OF DOCUMENTS
	)	AND THINGS
Plaintiffs,	)	
	)	
v.	)	
	)	
DONALD H. RUMSFELD, Secretary of	)	
United States Department of	)	
Defense; and Francis J. Harvey,	)	
Secretary of the United States	)	
Department of the Army,	)	
	)	
Defendants.	)	
	)	

EXHIBIT 69

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant United States of America (United States), hereby submits its Response to Plaintiffs' First Set of Interrogatories and Requests for Production of Documents dated November 20, 2006.

PRELIMINARY STATEMENT

The Responses that follow are based upon the best knowledge, information, and belief of the United States at this time. The United States reserves the right to amend or supplement this Response if different or additional information is subsequently discovered, or if the relevance or significance of information currently known is subsequently ascertained. Nothing in the response shall be construed as, or considered to be, final or exhaustive, nor shall this Response prejudice the United States' right to further discover, research, analysis, or presentation of evidence at trial.

GENERAL OBJECTIONS

The United States makes the following general objections, which are continuing in nature:

1. The United States objects to the Interrogatories to the extent that they seek information that is protected from disclosure by the attorney-client privilege, the pre-

Training Area (PTA) on the island of Hawaii.

a. Stryker Fielding, Operational New Equipment Training (OPNET), and Field Level Maintenance New Equipment Training (FLMNET):

Stryker Fielding

There are currently 161 Stryker vehicles on Oahu; 113 Strykers have been handed off to the 2d SBCT, and we anticipate fielding another 206 Stryker variant platforms and their associated systems between now and July 2007. See Annex B (Stryker Vehicle Disposition).

OPNET

As of 27 November 2006, 23 Stryker OPNET classes still need to be conducted in order to provide a basic level of individual and crew training. These courses range from 18 to 47 days and equate to 621 days of required training and will include a total of 833 Soldiers. See Annex C (OPNET Course Descriptions) for complete information on all Stryker OPNET Courses. Prior to conducting Stryker OPNET, crews must first conduct Pre-OPNET weapon familiarization with all pintle mounted weapons for the vehicle (MK-19 40mm Automatic Grenade Launcher, M240 7.62mm Machine Gun, and/or M2 .50 Caliber Machine Gun). Pre-OPNET is fired on range KR-3 for the M2 .50 caliber machine gun and M240 7.62 Machine gun. The MK-19 40mm Automatic Grenade Launcher

Pre-OPNET must take place at QTR1 since it is the only range on Schofield Barracks that can accommodate the weapon system.

FLMNET

As of 01 November 2006, 35 FLMNET classes still need to be conducted in order to provide a basic level of Stryker recovery and maintenance to the Brigade. These courses range from 3 to 34 days and equate to 550 days of required training and will train a total of 180 soldiers. See Annex C (OPNET Course Descriptions) for complete information on all Stryker OPNET and FLMNET Courses.

b. Collective Training: Collective training from squad to battalion level and the integration of the Stryker vehicles into both blank and live fire operations will occur from now until June 2007 at Schofield Barracks and PTA in preparation for the SBCT deployment to the National Training Center in September 2007. Imperative to the Brigade's success at the National Training Center and while deployed will be its ability to conduct sustainment training on all systems and equipment (to include Stryker Vehicles) following OPNET. This training will include daily crew synchronization, vehicle maintenance, Army Battle Command System (ABCS) equipment training (Digital Systems Training), Field Training Exercises (FTXs), Live Fire Exercises (LFXs), convoy LFX training, medical evacuation training, etc.

See Annex D (2d SBCT Battalion Level training requirements for Schofield Barracks and PTA) for detailed FTX examples that include timeline, tasks to be trained, and a mission essential task assessment. It is important to note that the Battalions are currently untrained in 5 of their 7 mission essential tasks (METLs) and the Companies are currently untrained in 5 of their 6 METLs. These FTXs will bring the Battalions to 5 of 7 METLs assessed as either trained or needs practice and the Companies to 4 of 6 METLs assessed as trained. These mission essential tasks are unit specific tasks that have been identified as essential for the unit to be able to perform its mission. See Annex E (SBCT Brigade, Battalion, Company METLs and Platoon Battle Tasks) for a list of all SBCT unit level METLs and Battle Tasks.

Additionally, the 2d SBCT will conduct 7 Battalion FTXs at Schofield Barracks and PTA prior to June 2007. These FTXs will include 152 Squad or Section LFXs on KR 3, 4, 5, 6 (Schofield Barracks) and Range 1, 8, 10, and 20 (PTA); 45 Platoon maneuver LFXs on KR 3, 4, 5 and 6 (Schofield Barracks) and Range 1, 8/8B, and 10 (PTA); and 50 Platoon convoy LFXs on Range 1 and 10 (PTA). LFWs On Ranges KR4, 5, and 6 at Schofield and Range 1 at PTA will be dismounted only. The number of training iterations conducted does not equal a trained unit. Each unit must conduct

LFXs to standard to be rated as a trained unit.

c. Advanced Marksmanship Training: Combat focused advanced marksmanship training has been scheduled through June 2007 and is an integral requirement for our all of our combat arms and combat support soldiers. This is a very complex task and takes time to execute to standard. Any disruption in our current glide path will severely hinder our advanced marksmanship capability in combat. 2d SBCT needs to conduct 37 Company Level Advanced Marksmanship Densities. Each marksmanship training density is one week in duration and the training is conducted on the Schofield Barracks Match Shoot House, the Grenade House, and the Infantry Demo Range as well as the PTA Match Shoot House.

d. Gunnery:

Gunnery training provides the challenge and goals necessary to attain the high standards required in Stryker gunnery proficiency. Several focused levels and conditions are integrated into this training.

PRELIMINARY

Preliminary gunnery introduces new Stryker crew members to gunnery tasks while sustaining the skills of experienced crew members. Consisting of both classroom instruction and hands-on training, commanders conduct this training year-round at the home station.

#### BASIC GUNNERY

Basic gunnery trains squads and crews in the tactical employment and marksmanship of the Stryker's weapons systems in simulated and live fire situations. Stryker crews continuously train using the vehicle's embedded trainer in order to prepare them for Stryker practice and live fire qualifications.

Before conducting collective gunnery training, crews, squads, and platoons must develop proficiency in individual and collective tasks. They gain these skills by training in specified Soldier and gunnery duties.

Gunnery training must be mastered before a Soldier can earn the specialty title of Stryker crew gunner. Squad and crew-level gunnery progresses into larger section and platoon qualification requirements through a series of exercises and specific gunnery engagements conducted during the day and at night. Expert crew and squad level engagements against single and multiple targets must be successfully demonstrated in a wide variety of conditions before any Soldier receives a trained rating status.

#### ADVANCED GUNNERY

Advanced gunnery integrates all crews into a tactical scenario that familiarizes them with the sights, sounds, and smells of



the battlefield. This realistic training cannot be reproduced using simulators or simulation substitutes. Platoons and sections refine and verify tactics and techniques developed during previous training. Training consists of platoon Situation Training Exercises (STXs) and LFXs. During advanced gunnery platoons are evaluated on their collective live fire training proficiency level. All of this training prepares our crews, squads, and platoons for complex live fire gunnery tasks that will be conducted on QTR1 at Schofield Barracks and ranges 1, 8/8B, 10, and 11T on PTA.

Home station gunnery (HSG) at Schofield Barracks and PTA is a continuous and progressive training program that is required prior to a training deployment to the National Training Center and before deployment to the CENTCOM theater (Iraq or Afghanistan). Each of the ten Stryker variants noted earlier will conduct multiple iterations of gunnery at ranges on Oahu (QTR-1, KR-3 and KR-4, KR-5, and KR-6) and PTA (Range 1, 10, 11T, and 8/8B) until July 2007 (See Annex F - 2-25 SBCT Stryker Gunnery Program). Gunnery for these variants includes the firing of the M2 .50 Caliber Machinegun and the Mk-19 40mm Automatic Grenade Launcher. The Department of the Army training doctrine mandates a semi-annual training requirement for each Stryker Crew regardless of variant type. This equates to a



requirement for 40 Company Level Gunnery Densities prior to June 2007. The 120mm Mortar will also be fired, but only at PTA from already established firing points (FPs 801, 802, 804, 808 and on Range 10) and will fire into the current PTA impact area.

MGS Gunnery:

Gunnery for all 27 MGS vehicles will occur at Range 11T on PTA. The primary weapon system that will be fired by MGS crews on Range 11T is the 105mm cannon. Additionally, each MGS will fire the M240C 7.62mm and M2 HB Caliber 50 machinegun on Range 11T. The M240C, M2, and Advanced Inbore Marksmanship Training Enhancement System for Tanks Semiauto (AIMTEST-SA) will also be fired on Ranges QTR-1, KR-3, KR-4, KR-5 at Oahu and Ranges 1, 8, 10, 11T, and 20 at PTA multiple iterations (See Annex F - 2-25 SBCT Stryker Gunnery Program) prior to 2<sup>nd</sup> Brigade's deployment to the NTC in August of 2007. This equates to a requirement for 27 MGS Stryker Vehicles to conduct Gunnery prior to June 2007. The above land and training resource requirements need to be deconflicted so that each Battalion has the ability to train. The Brigade is also competing for these resources with other Army units and other Department of Defense organizations. During FY 07, The Remote Weapon System Block II modification will be OPNETed. This will require additional training for all ICVs, CVs, NBC-RVs, and ESVs upon fielding.

- SDZ for KR3
- UAC SDZ M203 40mm TP and C4
- Memorandum, HQDA, Army Infantry Center, SUBJECT: Stryker Operator New Equipment Training (OPNET) Entrance and Exit Criteria

INTERROGATORY NO. 7: Please describe with particularity each training exercise you contend the 2<sup>nd</sup> Brigade must conduct at QTR1 to be mission deployable as an SBCT, including, but not limited to, a description, with respect to each exercise, of the number of days the exercise would last, the number of soldiers that would participate, the number and type of weapons that would be employed, the surface danger zones for the weapons that would be employed, the number and type of munitions that would be expended, the number and type of Stryker vehicles that would participate, and the ranges or other locations where each exercise would take place.

RESPONSE TO INTERROGATORY NO. 7:

Notwithstanding the foregoing objections the United States responds Interrogatory 7 as follows:

Overview:

Live fire training on QTR1 is critical to enable 2<sup>nd</sup> Brigade to be mission deployable as an SBCT and to prepare its Soldiers for

the rigors of combat in a complex operating environment. Of significant note, QTR 1 is the only range facility in Hawaii that enables Stryker Gunnery training to doctrinal standards and MK-19 specific training. The primary tasks that 2<sup>nd</sup> Brigade will conduct on QTR1 is crew-served weapons / machine gun (M2 .50 caliber machine gun, Mk-19 automatic grenade launcher, and the M240B 7.62mm machine gun) qualification and training. This training will occur in four phases: Phase I - Stryker Pre - Operator New Equipment Training (Pre-OPNET) Weapons Certification; Phase II - Stryker Operator New Equipment Training (OPNET) Weapons Certification; Phase III - Training of Stryker Crews on the new upgraded Remote Weapons Station (RWS); Phase IV - Stryker Sustainment Training (Platoon LFX and Gunnery).

Phase I. Stryker Pre - Operator New Equipment Training (Pre-OPNET) Weapons Certification

Every Stryker crew is required to qualify with their assigned crew serve weapon (M2 .50 Cal Machine Gun, MK-19 Automatic Grenade Launcher, or M240B 7.62mm Machine Gun) in a dismounted posture on a static range set-up as part of the entrance requirements to begin the OPNET phase of training. QTR1 is one of only two ranges at Schofield Barracks that can support this training. There are 42 crews (84 soldiers) remaining that require Pre-OPNET certification. These crews require a minimum

of six training days to certify all crews. Each M2 crew (total of 24 crews) will fire 644 rounds for a total of 27,048 rounds. Each MK19 crew (total of 18 crews) will fire 352 rounds for a total of 6336 rounds.

Phase II. Stryker Operator New Equipment Training (OPNET)  
Weapons Certification

Every crew assigned to a Stryker platform mounted with a MK-19 40mm Machine Gun is required to conduct a two day gunnery familiarization training exercise to achieve OPNET certification. This equates to 70 training days across the SBCT under the OPNET Program of Instruction (POI). During the exercise, crews fire at stationary targets both day and night using 40mm Target Practice (non-dud producing) ammunition. Each crew will fire 348 rounds of ammunition. There are 21 Reconnaissance Vehicle (RV) crews (84 soldiers), 86 Infantry Carrier Vehicle (ICV) crews (344 soldiers), and 22 Commander's Vehicle (CV) crews (88 soldiers) that must conduct the gunnery exercise to complete OPNET requirements for a total of 40 training days required to complete OPNET.

Phase III. Training of Stryker Crew on the new upgraded Remote Weapons Station (RWS)

2<sup>nd</sup> Brigade is the first SBCT to be fielded with the upgraded RWS firing platform. The Block II upgrade will be the most accurate

precision weapon system platform ever to be fired at Schofield Barracks, Hawaii and greatly reduces the opportunity for errant rounds down range. Every crew on a Stryker RWS firing platform is required to conduct a two day gunnery exercise to certify training on the upgraded system. Firing will be conducted both day and night. Firing will be from a stationary and a moving Stryker vehicle at both stationary and moving targets. The two weapon systems mounted on the upgraded RWS to be fired are the 50 Cal M-2 Machine Gun and the MK-19 40mm Machine Gun. Each Stryker crew equipped with a MK-19 will fire 128 rounds of 40mm Target Practice (non-dud producing) ammunition and each crew equipped with a M-2 will fire 224 rounds of 50 Cal Ball and Tracer ammunition. There are 128 Infantry Carrier Vehicle (ICV) variant crews (512 soldiers) that require RWS certification. Of the 128 variants, 74 RWS will be mounted with the M-2, 54 will be mounted with the MK-19. There are 27 Commander's Vehicle (CV) variant crews (108 soldiers) that require RWS certification. All CV variants will be mounted with the M-2. There are 9 Engineer Squad Vehicle (ESV) variant crews (36 soldiers) that require RWS certification. All ESV variants will be mounted with the M-2. There are 3 NBC Reconnaissance Vehicle (NBC-RV) variant crews (12 soldiers) that require RWS certification. All NBC-RV variants will be mounted with the M-

2.

Phase IV. Stryker Sustainment Training (Platoon LFX and Gunnery)

2<sup>nd</sup> Brigade will conduct platoon level LFXs on QTR1 in order to increase small unit proficiency in the execution of: react to contact battle drills for crew (individual Stryker vehicles), section (two Stryker vehicles) and platoon (four Stryker vehicles) level operations; fire commands; and semi-annual gunnery qualifications in accordance with published Army standards. This training will be essential to maintain unit proficiency for combat readiness. 2<sup>nd</sup> Brigade will conduct 45 Platoon maneuver LFXs and 40 Gunnery densities on QTR1 between January and June 2007. Again, the projected number of LFXs/Gunnery densities does not equal trained units. The units must perform the live fire exercises to standard to achieve a trained rating. If a unit does not meet the standard, additional live fire training iterations will be required to get the platoon to a combat standard.

All the training described above must be conducted at QTR-1 because there is no other firing range on Oahu or Hawaii that allows 2D Brigade to qualify to standard as an SBCT.

REQUEST FOR PRODUCTION NO. 7: Please identify and produce all documents that support, contradict, discuss or are in any way related to your response to Interrogatory No. 7, including, but not limited to, any schedules for training at QTR1.

RESPONSE TO REQUEST FOR PRODUCTION NO.7:

Subject to and without waiving the foregoing objections, the United States responds to Request for Production 7 as follows:

See Response to Request for Production No. 5.

INTERROGATORY NO. 10: Please describe with particularity each training exercise you contend the 2<sup>nd</sup> Brigade must conduct at the UAC to be mission deployable as an SBCT, including, but not limited to, a description, with respect to each exercise, of the number of days the exercise would last, the number of soldiers that would participate, the number and type of weapons that would be employed, the surface danger zones for the weapons that would be employed, the number and type of munitions that would be expended, the number and type of Stryker vehicles that would participate, and the ranges or other locations where each exercise would take place.



RESPONSE TO INTERROGATORY NO. 10:

Subject to and without waiving the foregoing objections, the United States responds to Interrogatory 10 as follows:

1. One important facility is the Urban Assault Course (UAC) at Schofield Barracks. The UAC is designed to provide a facility capable of training units in urban terrain combat, like that found in both overseas theaters. This facility is a dismounted (on foot) range used to train Soldiers on combat in urban areas on both individual and small unit tasks. Soldiers are required to acquire and practice the drill techniques of entering and clearing hostile forces from urban buildings while minimizing casualties to friendly forces and civilian non combatants. Personnel identification, fire discipline, teamwork and ballistics effects experience can only be achieved by training at the UAC. The UAC is built over the former site of the older but similarly designed Military Operations in Urban Terrain Assault Course (MAC), which used in the past by units in Hawaii to practice urban fighting techniques. This facility is designed to satisfy training requirements and skills needed by dismounted infantry to defeat the enemy in the modern battlefield. The UAC is critical because, without it, Soldiers

and units will not be able to become proficient in the type of terrain and conditions they will encounter in combat.

2. 2/25 SBCT's use of the UAC will be limited to dismounted individual and small-unit live fire drills. The largest size unit using the UAC would be a platoon which consists of 40 Soldiers on average. It is a certainty that 2/25 SBCT will be engaging in urban warfare when deployed. 2/25 SBCT must be ready to deploy for strategic missions by November 1, 2007. In order to accomplish this, there are two essential levels of urban training activities that must occur. These activities maximize the use of the UAC.

a. Individual Soldier urban training: Because of the complexity of the activities in overseas theaters this training proceeds continuously in all Army units for both initial familiarization and sustainment training on various skills. Individual Soldiers are trained on urban clearing and defense and other urban combat skills. Individual soldiers use their assigned weapons, which consist of the 9mm pistol, the 5.56mm M-4 carbine, M-16 rifle, Squad Automatic Weapon and the M-203 Grenade Launcher with a 40mm training round.

b. Collective training: Collective training involves the same weapons, but the training in increasingly larger units, beginning with teams of five Soldiers, and squads of 10

Soldiers, and culminating in platoon exercise of approximately 40 soldiers. Squad and platoon level exercises are conducted to train Soldiers and their leaders on how to integrate all the assets they have been given at the platoon-level.

c. With the exception of the Shoot House and Grenadier Range, all firing will involve blank ammunition. The Shoot House is not completed, but if in use, only 9mm and 5.56 mm ball ammunition would be used in the interior of this facility. The amount of ammunition used depends on the number of Soldiers training at the Shoot House, but would average about three 15 round clips per Soldier. The Grenadier Range also is not in use. It will involve no more than six 40mm rounds per soldier.

d. No training is scheduled for the UAC, because it is not complete. Stryker vehicles would be used to drive up to and through the UAC. A platoon would use four Stryker vehicles. Exercises at the UAC would seldom exceed one day.

3. The UAC is made up of five training stations and two additional trainers for associated tasks.

a. Station one, the Individual and Team Urban Trainer, which is made up of a single three-room structure for training teams and squads on dismounted techniques of building and room clearing. Leaders will train and evaluate teams in the team formation and observation, identification and distribution of simulated fires

at a basic level using targets and simulated enemy and friendly personnel.

b. Station two, the Squad and Platoon Urban Trainer, which is a four structure complex with multiple routes and entry and exit points that builds on the complexity of tasks for the next larger unit that was learned on station one using simulated fires and leader grading.

c. Station three, the Grenadier Course Gunnery Trainer, which is one structure facade used to train soldiers assigned as M203 shoulder-fired 40mm Grenadiers on target engagement in urban areas. This facility uses the M781 40mm training practice grenade to train and score accuracy in engaging targets in an urban area.

d. Station four, the Offense and Defense Platoon Trainer, which is a one multiple building structure used to train squad or platoon sized units on force against force clearing and defending buildings using simulated munitions and sensors to provide realism of reactions of real opponents with opposing tasks.

e. Station five, the Breach Facility, which is a pre-designed replaceable wall, door and window structure used to train teams on defeating barriers and entering buildings using common implements, hand tools, or minor training explosives. This

facility can be used repeatedly by replacing panels of a facade replicating different materials found on most buildings.

f. Additional trainer, the Underground Trainer, which is a complex underground facility replicating sewers, basements, tunnels with multiple entry and exists for training on subterranean clearing operation using simulated munitions and targets or opponents.

g. Additional trainer, the Shoot House, which is made up of a single seven-room ballistic proof structure for training teams and squads on the techniques of live fire with service building and room clearing. Leaders will train and evaluate teams in the distribution of live fire and targets. The munitions are contained within the building. This is the only live fire training at the UAC, other than the Grenadier Range.

4. The UAC is more than 50 percent complete. It was originally due to be completed on 1 June 2007, and prior to the injunction was 30 days ahead of schedule, but each day the injunction remains in place further delays the Army's ability to complete this critical training facility. At this time, should the injunction be lifted on the UAC, we are speculating the UAC would be done in July prior to 2/25 SBCT deployment for collective training and would also be available for the interim two months when 2/25 SBCT personnel would return to Schofield to

train while the brigade's equipment and Stryker vehicles are shipped to Iraq. Because this facility is not yet finished, final training plans for use have not been completed. Once a firm completion date is established a complete training plan would be formulated using the UAC for both Stryker and non-Stryker units.

REQUEST FOR PRODUCTION NO. 10:

Please identify and produce all documents that support, contradict, discuss or are in any way related to your response to Interrogatory No. 10, including, but not limited to, any schedules for training at the UAC.

RESPONSE TO REQUEST FOR PRODUCTION NO.10:

Subject to and without waiving the foregoing objections, the United States responds to Request for Production 10 as follows:


See Response to Request for Production No. 5.

REQUEST FOR PRODUCTION NO. 24: Please identify and produce all documents that depict, discuss or are in any way related to the current construction plans for, or design of, the UAC, SBCT Motor Pool, MDF, and PTA's Range 11T.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Subject to and without waiving the foregoing objections, the United States responds to Request for Production 10 as follows:

- See attached Index for documents related to UAC.
- See attached Index for documents related to SBCT Motor Pool.
- See attached Index for documents related to MDF.
- In-Progress Review (IPR) Brief for Range 11T Upgrades, PTA.
- Statement of Work, Trail Construction, Repairs, and Improvements, Range 11T Revitalization, PTA, Hawaii

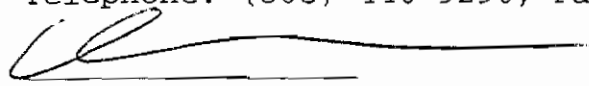
  

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Robert M. Lewis  
Attorney for Objections

Respectfully submitted this 28<sup>th</sup> day of November, 2006.

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